

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)
) **No. 3:24-CR-00151**
v.) **JUDGE RICHARDSON**
)
MATTHEW ISSAC KNOOT)
)
)

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

The United States of America, by and through undersigned counsel, moves this Honorable Court to allow the United States to file, under seal, exhibits to the United States' Notice of Expert Testimony.

The "Administrative Practices and Procedures for Electronic Case Filing (ECF)" requires parties to file a motion seeking leave of court prior to filing any documents electronically under seal. The United States' Notice of Expert Testimony includes the complete resumes and other sensitive personally identifiable information of the United States proposed expert witnesses. Therefore, the United States requests that these exhibits be placed under seal. If approved, the United States will provide the exhibits to the United States' Notice of Expert Testimony to the defendant, through counsel, by email.

Respectfully Submitted,

Date: May 9, 2025

By: /s/ Gregory J. Nicosia, Jr.
GREGORY J. NICOSIA, JR.
D.C. Bar No. 1033923
Trial Attorney
National Security Cyber Section
National Security Division

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2025, a true and correct copy of the foregoing document was filed with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for the defendant.

/s/ Gregory J. Nicosia, Jr.
GREGORY J. NICOSIA, JR.
D.C. Bar No. 1033923
Trial Attorney
National Security Cyber Section
National Security Division